

4. In addition, Plaintiffs/Counterclaim Defendants must respond to two separate Motions to Dismiss as well as responding to the counterclaims within the similar time frame. In order to adequately respond to both the Motions to Dismiss, and the Counterclaim, Plaintiffs will have to make at least three and perhaps four separate filings.

5. Counsel for the parties have agreed that as a matter of efficiency and to avoid duplication of arguments to the greatest extent possible, all briefing on dispositive motions should occur on the same schedule. Counsel for Defendants have therefore agreed that Plaintiffs should be allowed to file their response to the Motions to Dismiss and Counterclaim Defendants file their responsive pleading(s) on or before October 10, 2014. As part of this agreement, the time for Defendants' to file reply briefs on their Motions to Dismiss, if any, would be extended so that they would due on or before October 30, 2014.

WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request that this Court extend their time to respond to the Motions to Dismiss and Counterclaim through and including October 10, 2014.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to all counsel of record.

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